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June 13, 2002

Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, SW, Portals
Washington, DC 20554

RE: *Application by Verizon New Jersey for Authorization To Provide In-Region, InterLATA Services in State of New Jersey, Docket No. 02-67* ***REDACTED***

Dear Ms. Dortch:

This letter responds to Verizon's Ex Parte letter of May 17, 2002. MetTel takes issue with several key points in Verizon's presentation as will be detailed below. Contrary to Verizon's statements, MetTel's data analyses do not represent disagreement with existing defined processes or adopted business rules. The "disagreement" lies with Verizon's misapplication of those rules to arrive at statistics which falsely represent Verizon's OSS performance to be high quality, whereas in reality, Verizon continues to provide substandard and unacceptable OSS service to CLECs.

False Notifiers – Usage After Suspension

Verizon states that MetTel's analysis of usage following service suspension orders is incorrect, due to MetTel's use of certain "inappropriate" blocking options.[1] Verizon's analysis is wrong. Verizon fails to mention that one of the blocking options they now criticize MetTel for using was not documented as inapplicable until May 9, 2002. All of MetTel's data analyses were prepared prior to May 9th. It is disingenuous to claim use of this blocking option as a MetTel error, when in fact MetTel was simply doing what was documented the entire time. If Verizon had conducted a real investigation, they may have resolved the blocking problems by now.

It is important to note that every one of the PONs which Verizon claims falls into this category, was Confirmed, Provisioning Completed and Billing Completed by Verizon with the appropriate notifiers transmitted to MetTel. If MetTel had ordered a block that

[1] Verizon Ex Parte letter to Marlene Dorch, Secretary, from Clint Odom, dated May 17, 2002 in Docket No. 02-67 ("Verizon's May 17 Ex Parte") at 2.

was improper, those orders should have been rejected. Verizon has explained that in such cases there was a manual error where the representative inappropriately confirmed the order. Apparently, the "manual error" enabled two system errors for each PON (the provisioning completion and the billing completion). If the ordered block was improper, it should not have been provisioned.

The fact that orders requesting operations which Verizon classifies as "improper" receive provisioning completion notices, is itself indicative of the problem. If the order is "improper" it should not have been provisioned. The PCN sent to the CLEC essentially represents a claim of work being done, which Verizon now claims is impossible to do. In the absence of any messages to the contrary, MetTel has no choice but to rely on the notifiers generated and transmitted by Verizon's systems. When these notifiers are meaningless, MetTel is seriously operationally undermined.

Verizon claims that these orders should not have been provisioned, and their release for provisioning was due to "manual error". There are apparently little or no internal quality controls to prevent the CLEC from receiving false notifiers due to admitted Verizon personnel errors. It should be noted that other orders for various blocks were correctly rejected or confirmed during this period. Thus, these specific PONs represent failures of the system in its largest sense.[2]

Verizon also offers another explanation for usage following a suspension. Verizon states that when it prepares to migrate a customer back to Verizon, it will lift the suspension on that customer's service, if one exists. However, Verizon fails to note that the average interval in which they restore an account prior to the winback is 100% greater than the interval they had advised the industry. Rather than restoring accounts an average of one day prior to migration, Verizon has been restoring accounts an average of two days prior to migration. Thus CLECs are unable to rely on intervals claimed by Verizon in order to perform analyses to test for system problems.

<u>Missing Notifier Trouble Tickets</u>

With respect to Missing Notifier Trouble Tickets, MetTel restated the performance results for the June through December 2001 period during the course of Business-to-Business reconciliations. This restatement brought MetTel's results somewhat closer to those claimed by Verizon. Nevertheless, the basic fact, which Verizon does not note, is that they did not meet (based on the reconciled data) the criteria for passing which were established in FCC 00-92. The data that Verizon presents from MetTel showing their

[2] Verizon tries to differentiate between system failures meaning specific software or hardware failures and manual failures meaning operating personnel errors, however, the system involved in ordering and provisioning is composed of both manual and automated processes. These processes combine to constitute the total OSS.

performance clearly states[3] 95% in 10 business days. The standard is 95% in 3 business days. Verizon touts a performance of 88% in 3 business days and never mentions they failed to meet the consented to level of performance.[4] Verizon cheerfully reports its performance of 95% resolution in 13 days[5] as a positive achievement, while never noting that this performance failed the standard by 433%.

Since MetTel filed the results of the reconciliation noted above, MetTel and Verizon reconciled the March-April Missing Notifier data. As noted in MetTel's June 7, 2002 Ex Parte[6], Verizon's New Jersey performance did increase to 96.61%, but seemingly at the expense of performance for states which had previously received 271 approval. MetTel has presented its analysis of this issue in its June 7th Ex Parte letter.[7]

MetTel's Disagreement with Verizon's Reported Performance Measurements

In their May 17, 2002 filing, Verizon cites the KPMG examination of their measures as proof of their veracity.[8] This is an interesting defense, given New Jersey Board of Public Utilities Order dated March 28, 2002 relating to Dockets TX95120631 and TX98010010 (copy enclosed). This Order states ""It has been the experience of Staff since the adoption of the Guidelines in June 2000 that the reports issued to the CLECs and the Board contain discrepancies"[9]. Further, in the same paragraph, the Order goes on to state: "It is a paramount concern of this Board that VNJ be incented to produce reliable reports which contain accurate information."[10] MetTel has taken four years of software development, spurred by overwhelming operational problems, to develop the necessary systems to identify and track these serious performance gaps by Verizon. KPMG, on the other hand, functioned in an artificial environment which bears little resemblance to real world operations.

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[3] Verizon Ex Parte letter to Marlene Dorch, Secretary, from Clint Odom, dated May 17, 2002 in Docket No. 02-67 ("Verizon's May 17 Ex Parte") at 2.

[4] Verizon's May 17 Ex Parte at 2.

[5] McLean/Wiezbicki/Webster Supp. Decl. Para 42. as quoted on page 2 of Verizon's May 17 Ex Parte

[6] MetTel Ex Parte letter to Marlene Dortch, Secretary, from Elliot M. Goldberg, dated June 7, 2002 in Docket No. 02-67.

[7] Ibid.

[8] KPMG's reviews have been proven inadequate in the past. KPMG had certified Verizon's OSS for its New York 271 application in 1999. CLECs had noticed problems with late and missing notifiers during that time. However, Verizon had dismissed those claims as unfounded or resulting from CLEC error. Only a few months after Verizon was granted 271 authority, the problem of delayed and missing notifiers reached a level of such severity that it became an industry crisis. Verizon was then forced to admit that its systems were indeed losing notifiers, implement a complete system overhaul and pay millions of dollars in penalties. It took the better part of the year 2000 to correct this problem. The New York State Public Service Commission had relied on the KPMG review, while Verizon simply dismissed the real market experience of CLECs (although the problems were clearly present). Verizon is engaging in a similar pattern of behavior in New Jersey.

[9] NJ Dockets TX95120631 and TX98010010 Order dated March 2, 2002 page 3 para. C. Revised Performance Reports

[10] Ibid

As an attachment to this letter, MetTel is including copies of 37 Metric Change Notices that Verizon transmitted from March 17 through March 28, 2002. These change notices affect a variety of metrics and include changes that affect data for 22 months all the way back to June 2000. A system that is still discovering errors that affect data back to June 2000 cannot be assessed as accurate or stable. In fact, MetTel believes that Verizon has no basis to assert that their measurements are more accurate or valid than any challenge to them.

Also in their 5/17 filing, Verizon claims that MetTel is not performing its Performance Measurement calculations in accordance with the New Jersey Business Rules.[11] Verizon is wrong. The data for MetTel's metrics performance calculations is taken from Verizon's actual notifiers and Verizon's actual Flat Files. The calculation methodology comes from Verizon's rules posted on Verizon's website at http://128.11.40.241/perf_meas_ug/library.htm.[12]

Verizon goes on to explain the discrepancies between the SOP Notification Date and the actual Completion Date on the PCN.[13] In this explanation, Verizon proposes some interesting theories. Like most other Verizon hypothetical discussions, these theories do not stand up to examination. The two causes noted by Verizon for instances where the Completion Date and SOP date might not correspond are 1) the possible overnight posting of WFA and SOP and 2) where a technician completes the order at the end of one day and records its completion the next day. MetTel has three major types of migrations: those where the line exists and the migration is basically from Verizon or a UNE-P CLEC to MetTel's UNE-P account; those where a UNE-Loop is being ported back to the Verizon Platform for UNE-P service and new installations.

[11] Verizon's May 17 Ex Parte at 3. The only discrepancy may be a slight difference between New York and New Jersey which actually works in Verizon's favor. In the interest of expediency, MetTel used an older query which actually had a 5 PM Friday cutoff (appropriate for NY) hardcoded into it rather that the New Jersey specified 6 PM. Thus, Verizon received 1 extra hour per week grace time and still failed the metrics. If Verizon objects to the hour of grace, MetTel can (now that further development time has passed) re-run the numbers though it is to be expected that the failing scores will be even lower.

[12] The only exception to this is in metric OR-4-09. In this case, Verizon's Business Rules refer to a Select criteria where "SOP Notification Indicator =E OR CRIS Notification Indicator = E". Unfortunately, the Verizon Flat Files (according to the Verizon supplied file specifications) do not have columns titled "SOP Notification Indicator" and "CRIS Notification Indicator". The closest fields present in the flat files are "SOP Notification On-Time Ind" and "Notification On-Time Ind" (in the CRIS Completion Notification). However, these fields are not populated with "E" values but only "Y" or "N" options. This being the case, it is impossible for Verizon to perform the calculation that it claims to perform using its flat files and provided specification in arriving at statistics for Metric OR-4-09. Consequently, either Verizon is using a different data source, one not provided to CLECs; or not observing its own rules. It is precisely due to the issue of delayed PCNs and an unknown and non- quantifiable (by the CLECs) interval between actual work completion date and SOP posting date that the NY Guidelines replaced the OR-4-05 comparable metric with OR-4-16 which based the PCN transmission on the interval from the actual work completion date. This metric was specifically designed to be replicable by the CLECs based on verifiable data.

[13] Verizon's May 17 Ex Parte at 3.

For the first category, MetTel analyzed the March 2002[14], MetTel PCN CD and the Verizon SOP Date. The analysis yielded a perfect equivalence in 100% of the cases. Also, Verizon only has a WFA to SOP posting date issue when the two posting events occur overnight and one passes over midnight. However, as Verizon stated in their April 5, 2002 Ex Parte[15] "WFA updates SOP automatically 3 times per day". They further stated (on the same page) " 'Auto-complete' orders, those that do not require field work, complete on the due date in WFA via a nightly batch". Since the new Jersey SOP hours are specified in New Jersey Metrics OR-1 and OR-2 as up continuously except for 11:30 PM to 1:30 AM each night and 9:00PM Saturday to 8:00 AM Sunday, the only non technician input affected orders are the small subset that are WFA input late in the day and not SOP posted prior to the 11:30 PM shutdown. This actual sequence is radically different from the implied situation in Verizon's Ex Parte.

Further, Verizon indulges in their traditional game of making assertions without quantification. In fact, out of the ***** PONs MetTel analyzed for the NJ OR-4-05 & -09 (actually ***** for OR-4-05 and ***** for OR-4-09) sub metrics, only ***** (0.71%) were identified as potential candidates and ***** (0.44%) actually turned out to have been completed on the last day of the month and to have a Verizon SOP Notification Date of the first work day of the succeeding month.

Even if MetTel accepted the argument Verizon presented and reversed the months for which these PONs were counted, the net effect is "0" as an OR-4-05 sub-metric that had been reported as passed would now fail and the following month which had been reported as failed would now pass. It is important to note that of the relatively insignificant number of PONs that fall into this category, many do not conform to the one day posting delay proffered by Verizon as an explanation[16]. This fact by itself serves to underscore Verizon's practice of presenting theoretical scenarios regardless of their relevance to the problem under discussion, in an effort to avoid actually examining and resolving the issues.

With respect to the exclusion of Web GUI PONs of which Verizon accuses MetTel,[17] Verizon is engaging in a deliberate attempt to confuse the issue at hand. Of

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[14] This is the month for which Verizon posted the SOP Date 1 Field in addition to the Sop Notification Date Field

[15] Attachment " NJ OSS Discussion with the FCC" page 4

[16] ***** of these potential PONs were provisioning completed on the last day of the month and required 5 Business days for the PCN to be transmitted according to Verizon rather than the 1-day Verizon postulates. Of the ***** PONs in this group that were not completed on the last business day of the month ***** of them required an average of 6.5 days for PCN transmission according to Verizon. The ***** remaining PON was actually provisioned in October but the PCN was not sent until January for a delay of 66 days. (These examples were derived using the SOP Notification Field on the Verizon Flat File as the data source.) Both cases, of course, being rather more than the Verizon postulated 1 day. Only ***** of these ***** PONs appears to have been a dispatch order where the job might have been updated the next day. (It should also be noted that in the disputed PONs there were ***** where the Provisioning Completion date and the SOP Notification Date were in different months and Verizon included them on both month's files.)

[17] Verizon's May 17 Ex Parte at 4.

course MetTel counted Web GUI PONS in our total. In fact, had Verizon simply taken the time to carefully and conscientiously examine MetTel's data, they would have realized this.[18] MetTel can provide independently verified and verifiable data for EDI but not Web GUI PONs. Therefore, in the interest of expediency, MetTel simply classified all Web GUI PONs as having passed the metric (thereby granting Verizon possible grace items). If Verizon had read the summary exhibits and looked at the presented observation numbers they would have understood the true issues and possibly have meaningfully addressed them rather than waste time on inconsequential details which actually worked in Verizon's favor.

Improper Exclusion of Project PONs

Verizon objects to MetTel's treatment of the Project PONs. MetTel's treatment of the Project PONs is consistent with the Project letter as well as the New York Mass Migration Guidelines.[19] As stated in the project letter, MetTel gave Verizon its "authorization to exclude certain MetTel Local Service Requests (LSRs) from Firm Order Confirmation (FOC) and Reject Timeliness" the reason MetTel provided this authorization is also in the letter.[20] MetTel agreed to exclude the OR-1 and OR-2 metrics because the project involved a step that would cause Verizon to miss those metrics due to the course of the activity involved. Specifically, the letter stated "At MetTel's request, Verizon will not query LSR's submitted by MetTel with listed name fields that do not reasonably match Verizon records." Since the action of querying is related to metric OR-2 "Reject Timeliness" and not querying results in a confirmation that is governed by metric OR-1 "Order Confirmation Timeliness", MetTel implicitly recognized that this extra action on Verizon's part could necessitate extra processing time to complete and thus agreed to waive OR-1 and OR-2 for the project. However, once the confirmations were issued there were no further downstream activities or actions that would be affected. Provisioning Completion Notifers and Billing Completion Notifiers would still be unaffectedly issued by the relevant automated systems. Thus no extra processing times were requested or granted. Notwithstanding the specificity of the Project Letter, Verizon now seeks to improve its metric results for the purpose of obtaining 271 approval and is consequently twisting the purpose and intent of the Project Letter.

Evidently, Verizon was going to include the project PONs in their BCN Timeliness measure as they did in their PCN Timeliness measure until they realized their poor performance would cause an undesirable metrics score. As Verizon illustrated on page 67 of Attachment 15 of the McLean/Wierzbicki/Webster/Canny Supplemental Declaration of March 26, 2002 they reaccomplished metric OR-4-09 to lower the observations from

[18] The total difference column on the right side of the summary reconciliation exhibits for New Jersey metrics OR-1, OR-2 and OR-4 is the net difference between the total of MetTel EDI orders + MetTel Web GUI orders – Verizon reported orders.
[19] Guidelines adopted November, 9, 2001. These can be found at: http://www.dps.state.ny.us/MassMigGuidelinesNov14final.PDF
[20] Reply Comments of Metropolitan Telecommunications, dated April 19, 2002 Docket No. 02-67, Exhibit B.

***** PONs to ***** PONs and raise the score from 89.37% to 91.59%. The fact that the elimination of ***** PONs (89.6%) raised the score 2.22% means (extending Verizon's numbers) that the average PON in this group missed the 3-day standard by 95 minutes. This is hardly sufficient to assert that additional work was required. If, as Verizon asserts, that these processing actions increased the chances of Post Completion Discrepancies, then they are admitting that their operating quality controls on NMC Reps are poor and the results should have been apparent in metric OR-6 "Order Accuracy". For January 2002, the project month, Verizon reported a 96.85% score for this metric. This score is hardly conducive to an error rate which would cause PCD's. (Of course, MetTel would be more likely to accept Verizon's explanation of PCD occurrence if Verizon had not discontinued the PCD report they previously issued.) Thus, the issue of project PON exclusion is pure sophistry and the core of the issue is the presentation of a better metrics score.

Accurate BCNs

MetTel stands by its analysis of BCN accuracy. It is based on Verizon BCN's and the results from Verizon CABs analyzed using a query that has been coordinated and reviewed by Verizon personnel.

MetTel has provided examples of this issue to Verizon for over a year. It again provided examples in mid May. On Tuesday, June 11, 2002, MetTel met with Verizon to discuss this issue. The analysis performed by Verizon, supports MetTel's findings. Verizon tried to claim that PIC changes its analysis identified as problematic accounted for only a fraction of those claimed by MetTel. After investigation however, MetTel can demonstrate that the percentage figure of problematic PICs is derived from the entire data sample[21] and in that way closely mirrors MetTel's figure.

In their May 17 Ex Parte, Verizon noted the issue of Centrex blocking with respect to usage after receipt on a BCN for a suspension for non-payment (SNP). Briefly, one of the blocks they are discussing was not documented as non-applicable until May 9, 2002. In every case, NMC Representatives confirmed these orders and subsequently provisioning and billing completion notifiers were issued. Other blocking orders were rejected; Verizon has stated that these confirmations were manual errors. Again, then the issue of high scores on metric OR-6 arises. If there are so many manual errors (lately, Verizon has used the explanation of "manual error" for an increasing collection pf problems) the OR-6 scores should be abysmal and not the superb ones Verizon is reporting.

More importantly however, is the illustration, in this case, of an almost predictable Verizon pattern. MetTel raised the issue of BCN accuracy with respect to SNPs in New York, Pennsylvania and now in New Jersey. The current round of the New Jersey

[21] Verizon had tried to claim that it only investigated PIC changes identified as problematic by MetTel and that therefore, its figure represents a percentage of a percentage. In reality however, Verizon's percentage is based on the entire data sample which includes the problematic as well as the non-problematic PIC change PONs.

proceeding is the first time that Verizon has advanced the Centrex blocking explanation or the restoral prior to winback explanation. Previously, Verizon simply failed to respond substantively to MetTel's claims, preferring to ignore or to offer a blanket dismissal of MetTel's claims. Now, at the eleventh hour, Verizon presents a rationalization, which still fails to stand up to scrutiny. This behavior amply demonstrates Verizon's resistance to addressing and solving real and pressing operational problems, unless pushed and prodded relentlessly in 271 proceedings.

Weekend Restorals

In its May 17, 2002 Ex Parte letter, Verizon explains that it conducted a trial of a process that would enable CLECs to restore suspended platform customers after normal business hours and on weekends.[22] Verizon also states that it has now made this process available for use by CLECs in New Jersey.

Prior to the trial, MetTel urged that New York be used as the test state. Verizon claimed that it would start with New Jersey and then gradually implement the change in other states. Verizon has now made it clear that there is in fact no intention to expand the implementation of this change to other states, where it would be more helpful in light of a more mature competitive market. Verizon deliberately chose New Jersey because of the ongoing 271 proceeding and because it knew that the immature competitive base would return the desired result with minimum effort on Verizon's part. Accordingly, this maneuver has been quite successful for Verizon. In refusing to implement in New York, and other states where it might actually solve problems and have a positive impact on competition, Verizon has shown itself to have simply mounted a production for 271 purposes.

Conclusion

Throughout this proceeding Verizon has made several arguments which serve only to distract attention from the issues. Namely, Verizon repeatedly pointed out that MetTel is the only carrier that is raising many of these issues; and that there exist other forums for handling the issues raised by MetTel. Both of these are entirely irrelevant and have no bearing on this proceeding. In order to receive 271 authority, an ILEC must demonstrate that it provides service to competitive carriers in accordance with the competitive checklist. The data presented by MetTel in this proceeding demonstrates that Verizon's OSS in New Jersey is seriously flawed, and that therefore, Verizon fails checklist item 2. The 271 requirements of the Telecom Act do not call for a "critical mass" of complaints in determining whether an ILEC fails a checklist item. Instead, the ILEC is required to provide nondiscriminatory access to OSS. MetTel has demonstrated that Verizon does not.

[22] Verizon's May 17 Ex Parte at 7.

The fact that other carriers have not raised the issue is simply irrelevant, in determining whether a system problem exists.[23]

Verizon attempts to discredit MetTel by implying that because other carriers have not raised some of the issues presented by MetTel, MetTel's claims must be false. This is an argument typically made by someone who is unable to defend his position based on data or facts, and is attempting to distract attention from this reality.

Finally, Verizon enumerates the various other forums and methods through which it feels that all of these issues would be more properly addressed. For example, Verizon notes that MetTel has requested information from the Metrics Hotline, implying that directing inquiries to the hotline is an acceptable method for dealing with the types of problems that MetTel confronts here.[24] Verizon also suggests that MetTel bring disagreements to the NY Carrier to Carrier Working Group. This is interesting, as the New Jersey BPU has not suggested that the NJ Carrier to Carrier Metrics come under the auspices of the NY CWG. Nor has the NJ BPU proposed the adoption of the NY Metrics as other states have.[25] While it is true that other mechanisms and forums may theoretically provide opportunity for discussions, this fact is entirely irrelevant in determining Verizon's compliance with the 271 checklist. The only relevant fact is that Verizon has failed to show nondiscriminatory access, has failed to show that they provide proper support to CLECs, and has shown itself willing to go to any lengths to avoid providing meaningful solutions to serious system problems. The proper forum to consider these shortcomings is in the context of a 271 application.

It is most regrettably the case that Verizon is highly non-responsive, until critical issues are raised in 271 proceedings. These issues are not new. MetTel has been attempting to have them resolved by bringing them to Verizon's attention at every opportunity. In fact, the lauded business-to-business discussions were largely motivated

[23] It should also be understood that only a carrier who is both the local and long distance provider will see the total information picture and then only if their OSS is sufficiently sophisticated. The IXC's do not know whether or when the local carrier places a change order on the customer's behalf until they are notified. Purely local carriers do not examine the routing of the call to the proper IXC once they have a BCN which includes a CSR indicating that the PIC was changed. Only an organization which is both a local carrier and an LD provider and whose databases are so constructed as to allow for this analysis would identify the discrepancy.

[24] It would have been illuminating to the Commission had Verizon noted that it takes several days to obtain a response to questions. Dilatory response discourages utilization. More importantly, the hotline is a mechanism for providing information regarding metrics to CLECs, and is not an effective tool for dealing with deeper system problems or methodology disputes.

[25] Verizon asserts that the original New Jersey Carrier to Carrier Guidelines were based on the comparable New York Guidelines, so there are similarities. However, there has been a divergence over time. The New York Guidelines now have a metric (based on FCC 00-92) which reflects Missing Notifier Trouble Ticket Resolution (OR-10) that is not in the NJ metrics. This metric reflects the fact that NY included the FCC 00-92 standard as a PAP metric and it was retrofitted into the Carrier-to-Carrier Metrics. Also, NY developed three metrics (OR-4-11, -16 & -17) to replace and more closely monitor Provisioning and Billing Completion Notifiers.

by MetTel's raising these issues in this 271 case. Prior to this, MetTel had forwarded copies of similar analyses to Verizon on a regular basis for November 2000 through August 2001[26]. These submissions were totally ignored by Verizon and MetTel was forced to request NY PSC Staff intervention. The systems issues under discussion are the same systems problems that MetTel encounters in New York. It is MetTel's position that Verizon's persistent inattention to these issues in New York is the direct result of the reality that 271 authority has already been granted in that state.

Moreover, Verizon is in essence suggesting that it would be proper to grant it 271 authority, even though its systems do not meet requirements as long as it agrees to continue "discussions" of the problems in alternative forums. This is simply not the intent of the Act, which spells out the requirements that must be met *prior* to a carrier's petitioning for 271 relief. Furthermore, to do so would almost ensure that these issues would continue unresolved, as has been the case in other states where Verizon has received 217 authority.

This Ex Parte contains proprietary information and is subject to confidential treatment. A redacted version is also being filed. The twenty-page limit does not apply as set forth in DA 02-718. If you have any questions, please do not hesitate to call me.

Sincerely

Anna Sokolin-Maimon

Attachments

Cc:
FCC Staff
Verizon

[26] Data relating to usage after SNP; non-usage after migrations and restorations; inaccurate PIC changes; untimely and inaccurate Missing Notifier Trouble Ticket resolution.